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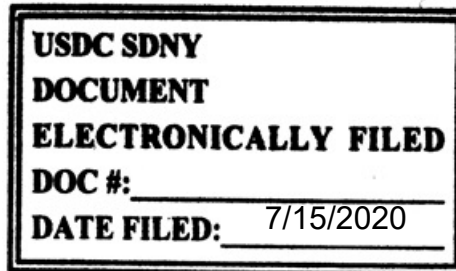
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July 13, 2020

Hon. Stewart D. Aaron
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Mazzocchi v. Windsor Owners Corp. et al., 11-cv-07913

Dear Magistrate Judge Aaron:

I write pursuant to your Order, Document No. 273, responding to my request, Docket No. 270, that you review a set of emails and rule on whether there has been excessive redaction and if so which text ought to be provided to plaintiff's counsel. Your Order directing me to file a letter with the Court regarding the basis for each redaction (e.g., attorney-client privilege, work product), without inclusion of any unredacted information, identify the name associated with the email address of each sender and recipient, and identify the role of each sender and recipient (e.g., Board member, counsel to corporation).

This letter provides the requested information.

EP000043

This page contains two emails, in reverse chronological order. The first in time, September 04, 2013, 10:22 a.m., is from Kittie Lonsdale ("Lonsdale"), at the time a member of the Windsor Board and the Board Secretary, to Vivienne Gilbert ("Gilbert"), at the time the President of the Windsor Board and a named defendant in this action, to "Windsor Owners Board", which is a group address which consists of every member of the Windsor Board, to Drew Moschella, who at the time and now is an employee of Tudor Realty Corp., to Steven Olin-Dabrowski, also then an employee of Tudor Realty Corp. At the time, Tudor was a defendant in the instant litigation. It is also addressed to "Windsor", which I am told is an email address for Bert Hernandez, who is the building superintendent and is a senior salaried employee of Windsor Owners Corp. The email is copied to Tom Curtis, who at the time was an attorney representing Windsor in the

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state ejectment proceeding then pending against Frank Mazzocchi. Attorney-client privilege claimed.

The second email in time is from Elaine Platt ("Platt"), at the time a Windsor Board member, to all recipients of the first in time email. Attorney-client privilege claimed.

EP000044

This is an email dated September 03, 2013, from Platt to Maureen Dunphy ("Dunphy"), at the time a Windsor Board member and a named defendant in this action. It is not show copied to counsel. Attorney-client privilege claimed.

EP000045

The redacted portion is contained in an email from Platt to the recipients of the emails on page EP000043. Attorney-client privilege claimed.

EP000047-49

These are a set of emails, in reverse chronological order, dated August 27, 2013, starting at 8:11 p.m. and concluding at 8:49 p.m. They are between Platt and Dunphy. They are not show copied to counsel. Attorney-client privilege claimed.

EP000052

This page contains an email from Dunphy to Platt dated May 29, 2013, at 9:44 p.m., and a response from Platt of the same date at 10:46 p.m. They are not show copied to counsel. Attorney-client privilege claimed.

EP000055

This page contains three emails between Platt and Dunphy dated September 13, 2013, between 10:40 a.m. and 11:33 a.m. They are not show copied to counsel. Attorney-client privilege claimed.

EP000059

This is an email from Platt to Lonsdale, Dunphy, and Paul Matten, at the time a Windsor Board member and a named defendant in this action. It is dated May 11, 2014. It is not show copied to counsel. Attorney-client privilege claimed for the redacted material.

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EP000062

This is an email from Platt to Drew Moschella, to three individuals (Mary Francis Shaughnessy, Howard Lazarus, and Anthony Colella), who have ownership interests in Tudor Realty Corp., to Dunphy, and to Gilbert. It is dated January 14, 2014. It is not show copied to counsel. Attorney-client privilege claimed.

EP000068

This page contains three emails, in reverse chronological order. The earliest is from Lonsdale to Gilbert, to Windsor Owners Board, to Drew Moschella, to Steven Olin-Dabrowski, and to "Windsorownerscorpnyc.rr.com", which I am informed is another email address for superintendent Hernandez. It is show copied to counsel. It is dated September 6, 2013, 11:59 a.m., and as *per* the title in the unredacted section, it refers to the same subject matter as the emails on EP000043. Attorney-client privilege claimed.

The next email is dated September 7, 2013, 10:12 a.m., and is from Gilbert to all persons on the prior email. Attorney-client privilege claimed.

The final email is dated September 7, 2013, 11:20 a.m., and is from Platt to all persons on the prior two emails, but not to counsel. Attorney-client privilege claimed.

Sincerely yours,

/s/ Jeffrey E. Glen

Jeffrey E. Glen

ENDORSEMENT: No later than Friday, 7/17/2020, Defendants shall file a letter with the Court, as follows: (1) identifying the full name of "Howard," who is mentioned on EP000055, and whether he was acting as an attorney for Windsor; (2) identifying the full name of "Cholst," who is mentioned on EP000048 and EP000055, and whether (s)he was acting as an attorney for Windsor; and (3) identifying whether "Jeffrey Reich," who is mentioned on EP000068, was acting as an attorney for Windsor. SO ORDERED.

Dated: 7/15/2020

